

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

ROBERT DAVID STEELE )

et al )

Plaintiffs, )

v. )

Case 3:17-cv-601-MHL

JASON GOODMAN )

et al )

Defendants. )

**JOINT STIPULATION OF DISMISSAL  
OF CLAIMS AGAINST DEFENDANT NEGRON ONLY**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff, Robert David Steele and Earth Intelligence Network (“Plaintiffs”), and Defendant, Patricia A. Negron (“Negron”), by and through their respective counsel, hereby stipulate and agree that this action shall be dismissed with prejudice as to Defendant Negron only, with each party bearing his or her own costs and attorney’s fees. This action shall remain pending as to Defendants Jason Goodman and Susan A. Lutzke. Plaintiffs and Negron agree that pursuant to *Kokkonen v. Guardian Life Insurance Co. of America*, 511 U.S. 375 (1994), this Joint Stipulation of Dismissal explicitly reserves jurisdiction in this Court to enforce the terms of the parties’ final settlement agreement.

Signatures of Counsel on Next Page

DATED: May 8, 2020

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